

**Americans for Financial Reform Memo to the Treasury Department  
On a Framework for Consumer Complaint-Handling  
at the Consumer Financial Protection Bureau**

**3 September 2010**

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Americans for Financial Reform CFPB Task Force  
and the following AFR members:

Center for Media and Democracy  
Center for Responsible Lending  
Consumer Action  
Consumer Federation of America  
Consumers Union  
Demos  
Empire Justice Center  
Greenlining Institute  
National Association of Consumer Advocates  
National Community Reinvestment Coalition  
National Consumer Law Center® (on behalf of its low-income clients)  
National Council of La Raza  
National Fair Housing Alliance  
National Peoples Action  
Public Citizen  
U.S. PIRG

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**Americans for Financial Reform Memo to the Treasury Department  
On a Framework for Consumer Complaint-Handling  
at the Consumer Financial Protection Bureau  
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**Page 1**

## Introduction and Summary

Americans for Financial Reform (AFR), joined by a number of its member consumer, civil rights and community groups,<sup>1</sup> offers these recommendations regarding the receipt, handling, resolution, transparency, and use of consumer complaints by the Consumer Financial Protection Bureau. We are offering these recommendations now because some of them should be facilitated in the design of the Bureau's information technology systems.

Please note that AFR and its members will have additional recommendations to follow concerning special forms of complaint-handling, such as referral and enforcement of Fair Lending laws and addressing coordination of consumer complaint-handling and military personnel and their families, although we discuss these issues briefly below.

Our organizations want an accessible, well publicized complaint process that provides results to consumers who complain and feeds information into the supervision, rulemaking and enforcement responsibilities of the Bureau, and where necessary, to other federal agencies including non-regulatory enforcement bodies such as the Department of Justice and the Department of Housing and Urban Development. This will require more than the receipt of complaints for use in trend analysis, which is the current approach to complaints by the FTC. It will require more than receipt of complaints and then forwarding them to the covered entity to resolve if it so desires, which often appears to be the approach taken by the OCC. It will require timelines, protocols to set expectations, and staff. "Collecting, investigating, and responding to consumer complaints" is a primary statutory function of the bureau under Section 1031(e) of the Dodd-Frank Act.

The complaint system will be a visible connection between the CFPB and the public. We propose that the complaint system include a complaint handling process geared to resolving complaints, with clear timelines, which meet public expectations. Having the CFPB become a "go to" spot for individuals with complaints will serve the public in two ways. First, it will help individuals. Second, when consumers bring their complaints to the CFPB because of its track record in resolving complaints, the CFPB will receive valuable information about what is occurring in the marketplace, including early warning signals of emerging problems. The more effective complaint outreach is, the more useful information the CFPB will receive. However, consumers will only provide complaint information over time if they experience good results in the process – that is, if their problems are resolved.

We further recommend that the CFPB empower consumers by providing an online, searchable, user-friendly database of complaint information. The database should provide members of the

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<sup>1</sup> The Americans for Financial Reform CFPB Task Force and the following AFR members have reviewed and endorsed the memo (in alphabetical order): Center for Media and Democracy, Center for Responsible Lending, Consumer Action, Consumer Federation of America, Consumers Union, Demos, Empire Justice Center, Greenlining Institute, National Association of Consumer Advocates, National Community Reinvestment Coalition, National Consumer Law Center® (on behalf of its low-income clients), National Council of La Raza, National Fair Housing Alliance, National Peoples Action, Public Citizen, U.S. PIRG.

**Americans for Financial Reform Memo to the Treasury Department**  
**On a Framework for Consumer Complaint-Handling**  
**at the Consumer Financial Protection Bureau**  
**3 Sept 2010** **Page 2**

---

public, the media, other regulators, and others with valuable information about consumer complaints by type of provider, practice, region, and similar characteristics. It will allow consumers to make more informed choices about whom they wish to deal with in the financial sector, based on the experiences reported by other consumers. It will help prevent problems. And finally, to the extent possible, the CFPB complaint system should be compatible with other major federal and state complaint systems.

**Summary of Recommendations:**

- 1) Transparency: public database of complaints redacting personal information of consumers.
- 2) Handling of complaints:
  - A) Actual attempts to resolve complaints, including CFPB recommended resolutions.
  - B) Clear timelines for resolution.
  - C) Quality standards for customer usability and satisfaction.
  - D) Consequences for providers who fail to resolve justified complaints.
- 3) Use in rulemaking, supervision and enforcement by CFPB and other agencies.
- 4) Ease of use for individuals.
- 5) Effective and diverse outreach about where and how to file complaints.
- 6) Active performance monitoring to specific performance statistics.
  - A) Complaint trend information gathered and shared with other regulators frequently.

**Americans for Financial Reform Memo to the Treasury Department**  
**On a Framework for Consumer Complaint-Handling**  
**at the Consumer Financial Protection Bureau**  
**3 Sept 2010** **Page 3**

---

**1) Transparency: Public database of redacted complaints:**

Suggested fields should include:

- A) Full complaint content, minus personally identifying individual information, searchable online from the time of filing. This system might also give the consumer the option to update the complaint to indicate satisfaction or dissatisfaction with the results.
- B) Easy to generate reports by users which permit sorting by covered entity, type of product, type of complaint with specificity (not just “fees”) and date received.
- C) Ability to generate reports reflecting “complaint ratio” or similar measure of the number or frequency of complaints by entity size.
- D) For the publicly accessible portion of the database, provide privacy protection for the individual complaining, not for the covered entity. Remove the last name, city, address, phone, email, account numbers and any other sensitive or identifying information.
- E) Database should generate user requested reports, at no fee to the public, using any or all of the following fields as well as others that may become necessary but are not identified here: by company – including information on affiliates and different entities under a bank holding company, type of product, practice at issue in the complaint, region, product type and issue.
- F) The CFPB to compile and make public at least annually a complaint resolution report by entity name, type of entity, product category, complaints per product, complaints per entity, size or product-volume-adjusted complaint ratio, and state of individual and of the entity.
- G) The database should be built to include a feature that permits a field for update which is viewable only by the CFPB and other regulators and law enforcement. This feature could track resolution information and to note the level of cooperation displayed by the entity. Complaint resolution status could also accompany the complaint and be publicly accessible.
- H) Complaint resolution statistics should be reviewed internally quarterly, and the CFPB should issue an annual public report on complaint resolution performance/results statistics. This report should include numbers of complaints, amounts recovered for consumers as a dollar number and as a percentage of the amounts initially sought, percent of complaints resolved to individual’s satisfaction, and percent of complaints resolved within 10, 30, and 45 days of receipt.

**Americans for Financial Reform Memo to the Treasury Department**  
**On a Framework for Consumer Complaint-Handling**  
**at the Consumer Financial Protection Bureau**  
**3 Sept 2010** **Page 4**

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Reasons for recommendations about complaint transparency: In the internet age, knowledge is power. The popularity of user review sites illustrates the value consumers place on learning about the experiences of others. The National Traffic Highway Safety Administration makes raw complaint data available to the public. <http://www-odi.nhtsa.dot.gov/complaints/>. The Consumer Product Safety Commission has been engaged in a workshop process to develop a publicly accessible complaint database. <http://www.cpsc.gov/about/cpsia/dbworkshop.html>. Consumers Union has made extensive comments in that workshop process which we would be pleased to share. <http://www.insurance.ca.gov/0250-insurers/0500-legal-info/0200-regulations/justified-complaint-regulations.cfm>.

Complaint sites have the most power when they provide the information promptly. Thus, we strongly recommend that the complaint database provide all complaints from receipt, and not be limited to some subset of “justified complaints” or of complaints that appear to illustrate a compliance violation. Consumers can benefit from learning that a financial services provider is doing something that makes its customers unhappy even if that activity is not illegal. To protect the privacy of individuals, we recommend redacting any personal identifying or sensitive information about individuals, such as last name, city, and account numbers. However, the names of the companies complained about must be included in order to make the information useful to consumers in their decisions about whether to use a particular provider or to seek a particular type of financial product.

Finally, we recommend that the CFPB’s reports about complaints, and the database, both inform consumers and the public about which products and which entities have high complaint ratios. For example, the California Department of Insurance provides complaint ratios to its public so that individuals can take this information into account in deciding which insurer to select. <http://www.insurance.ca.gov/0250-insurers/0500-legal-info/0200-regulations/justified-complaint-regulations.cfm>. It offers the public the results at: <http://interactive.web.insurance.ca.gov/companyprofile/companyprofile?event=companyComplaintEvent&doFunction=getCompanyPerformance&eid=6834>

**2) Complaint Handling:**

- A) Acknowledge all complaints within 3 days of receipt.
- B) Set goals for all complaints not requiring extensive factual investigation to be resolved to the customer’s satisfaction within 30 days of receipt, unless the CFPB finds that the complaint is unwarranted, documents the reasons for that finding in the complaint file, and notifies the consumer of the basis for the determination that the complaint is unwarranted within that time. Staff should be expected to resolve complaints within 30 days of receipt or to document in the file the reasons why this could not be achieved.

**Americans for Financial Reform Memo to the Treasury Department**  
**On a Framework for Consumer Complaint-Handling**  
**at the Consumer Financial Protection Bureau**  
**3 Sept 2010** **Page 5**

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- C) If more information is required from the consumer, be specific about what is needed. If information is required from the provider, be specific about the request and designate an expected date of receipt.
- D) If more information is needed or if the bank/provider claims that the facts are different from what the consumer asserts, provide an updated timeline to allow for submission and review of additional information with a clear target completion date.
- E) When the CFPB asks the covered entity to respond to a proposed resolution or present an alternative to a proposed resolution, require response within 10 calendar days, and CFPB staff review of that response within 5 calendar days of receipt.
- F) Negotiate to achieve a resolution when the institution refuses to resolve.
- G) Promptly report to the primary regulator every unresolved complaint where the CFPB's reasonable recommendation was not accepted. Provide timely public reports of entities who fail to provide resolution of reasonable complaints. Provide that the primary regulator acknowledge receipt of the unresolved complaint within three days, report back to the CFPB database what specific action it is taking on any unresolved complaint in no more than thirty days of receipt, and then report the result of the action that it took within thirty days of the conclusion of whatever action was taken. Provide that the CFPB report back to the consumer the information about the specific action taken by the primary regulator and the result. Provide that if a regulated entity is taking no action on an unresolved complaint, the matter is referred to enforcement within the CFPB.
- H) Provide a simple method for the consumer to report if the agreed-upon resolution was not honored by the provider, and require prompt CFPB follow up if a consumer does report non-compliance with an agreement.
- I) By regulation, develop a schedule of fines or civil penalties for failure to meet required timelines by providers and for failure to offer or agree to a reasonable resolution where warranted.

Reasons for recommendations regarding complaint handling and timelines: The CFPB has a statutory obligation to collect, investigate, and respond to consumer complaints. This means more than just sending the complaint to the bank or other financial services provider. The consumer will probably have already complained to their provider and not received satisfactory resolution before he or she seeks the CFPB's help, although this should never be required. Additionally, the financial entity may be relying on the traditional lack of regulatory intervention and enforcement. The complaints division will have to engage in outreach, intake, handling and follow-up through resolution to ensure that financial entities do not ignore complaints. Properly

implemented complaint handling, timeline and follow-up procedures will encourage financial entities to become more proactive in handling legitimate complaints and in adjusting their products to be less harmful prior to regulatory intervention. Over time, this means that vigorous complaint handling will contribute to the CFPB's overall mission to police the marketplace.

**3) Use complaint information in rulemaking, supervision and enforcement:**

**A) General Provisions:**

- i) Complaint trends should be reviewed at least once a month. Because complaints can be an "early warning" source of information about emerging problems, complaint trend information should be shared with decision makers throughout the agency and with all other financial institution regulators, both state and federal, as well as, with relevant non-regulatory enforcement agencies such as HUD and DOJ's Civil Rights Division.
- ii) If a complaint brings to light an unfair practice, the agency should pursue a remedy to make whole all consumers affected by the practice. In addition, peer entities should be examined to see if the same practice occurs at those institutions, or the primary regulator notified and advised to do such an examination.
- iii) If the complaint brings to light a failure of understanding in the customer base about the features of an account or loan, the CFPB should encourage the regulated entity to take steps to avoid the problem in the future, which may include changes in product design, marketing, disclosure and consumer education.
- iv) Where appropriate, initiate research requests to the Office of Financial Research based on the types of problems that are appearing in the consumer complaints.
- v) Inform other governmental bodies and agencies, including non-regulatory enforcement agencies, such as HUD and DOJ, about the nature of problems arising under their jurisdictions. Provide annual reports on problems identified and referred. Provide necessary personal information about the individuals filing the complaints to other governmental bodies and agencies as requested and needed to perform their functions, such as examination or enforcement.

- B) Rulemaking:
- i) The complaint database, the monthly trend analysis and the annual complaint report should be used to identify areas for rulemaking.
  - ii) The CFPB shall include in the rulemaking recorded complaints received by the agency which would be addressed by the rule. This will allow the public's experiences to become part of the record without consumers having to re-file those reports in the particular docket.
- C) Supervision:
- i) Upon receipt of complaint, code for easy retrieval in an exam process.
  - ii) Require examiners to review the complaints at the start of any exam.
  - iii) Periodic review of complaint trends and use of trend information in examiner training.
  - iv) Send periodic reports to other primary regulators for use in their exams (at least semi annually).
- D) Enforcement:
- i) Have policies, rules and standards regarding when to refer a complaint to enforcement. Refer to the CFPB's enforcement division all complaints which indicate a probable violation of law.
  - ii) Track how often complaints result in enforcement actions or relief extending beyond the individual complainant.
  - iii) For each unresolved complaint, report back to the consumer making the report, whether the primary regulating entity is taking an enforcement action and if so what action within three days of receipt of the information from the primary regulating entity. If the primary regulating entity is not taking an enforcement action, report what enforcement action the CFPB is taking within ninety days of learning that that the primary regulating entity is taking no action. If the CFBP is taking no enforcement action, this report should include an explanation why no action is being taken.



- E) Intergovernmental cooperation:
  - i) Inform other governmental agencies of the type and nature of complaints in their jurisdictions and about entities over which they have primary supervisory authority.
  - ii) On request, provide to other governmental agencies the contact information for the individual who has filed the complaint. A primary regulator or state Attorney General will need to do its own investigation, and the complainants should be a starting point for that work.
  - iii) Inform governmental entities who refer complaints of the resolution of those complaints.
  - iv) Seek information from other governmental entities about the types of complaints that they receive, including the nature and pattern of complaints with respect to issues, types of covered entities, and identity of covered entities.

Reasons for recommendations on the use of complaint information in rulemaking, supervision and enforcement: Complaints must feed meaningfully into rulemaking, supervision and enforcement. Predatory and other unacceptable practices may fly under the radar and do extensive harm to individuals, communities and segments of the population before the supervisory or enforcement units become aware of these problems. The use and frequent analysis of complaint information will identify problems and loopholes in existing rules, regulations and legislation. Early action reduces public harm and it also reduces the cost to industry by nipping bad practices before they spread widely and become an entrenched part of the business model. The CFPB should use complaint information to identify problems and trends that call for rulemaking, supervisory intervention, and enforcement. If the CFPB is not the appropriate supervisor or enforcement agency, it should promptly refer the analysis and recommendation to the appropriate federal regulator, state regulatory body, and legislative body.

**4) Ease of use for individuals:**

- A) Complaints should be taken by phone, mail, and online via a secure site. Consumers should never be told to wait for and file a paper form.
- B) Hours of operation should include some evening hours across time zones and at least one weekend day.
- C) Phone menus should be brief and usable, with a clear early option to speak to a live person.

**Americans for Financial Reform Memo to the Treasury Department**  
**On a Framework for Consumer Complaint-Handling**  
**at the Consumer Financial Protection Bureau**  
**3 Sept 2010** **Page 9**

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- D) Special attention should be paid to include Spanish & other languages for complaint forms, oral complaint filing and for communications with consumers who have complained.
- E) If any prerecorded consumer information is provided through or in addition to the complaint line, the prerecorded information should be in even more languages. For instance, California has more than ten language choices in its prerecorded system for Electronic Benefit Transfer. See: <http://www.ebtproject.ca.gov/faq.aspx>, listing eleven languages and counting spoken Cantonese and Mandarin as two languages.
- F) If the consumer has contacted the wrong agency, for example, if the complaint should go to the SEC or concerns an insurer regulated by a state Department of Insurance, the CFPB should forward the complaint to the proper agency and notify the consumer where the complaint has been sent. Complaint forms should include the necessary permissions to do this. Phone staff should be trained so that any referrals to other agencies include complete and accurate information about where to complain and why the consumer is being forwarded to another agency.
- G) The consumer should never be requested to engage in activity that results in a cost (except for the cost of copying original documents) to pursue a complaint, such as paying a notary fee.
- H) In the event that any consumer submits original documents, these should be copied and returned promptly to the consumer.
- I) Consumers should never be required to pursue the complaint with the provider or another regulator before bringing it to the CFPB nor should they be precluded from pursuing simultaneous action through other avenues.

Reasons for making the complaint center easy to use: The complaint center will be dealing with individuals with different ranges of sophistication. Complex phone menus and web pages that are difficult to navigate could lose people whose information the bureau needs to receive; the very people most likely to be victims of predatory practices. It is necessary that there be intake on nights or weekends for working people, including in the West, to ensure that people will have real access to the complaint system. It is essential that people be able to access someone who speaks their language so that scams developing in specific communities do not go unnoticed. The ease of use of the complaint process will be one of the most important determinants of the effectiveness of the complaint center. If people get frustrated with the process of filing a complaint they will abandon the system and encourage others not to use it. Any weaknesses in the reputation of the complaint center could quickly reflect on the CFPB's credibility.

- 5) Effective and diverse outreach about where and how to file complaints:**
- A) Marketing style number, such as 1-800-MyMoney, that is catchy and easy to remember. The same standard should be applied for the website name, such as financialhelp.gov. Proposed names should be tested against common spam filters and the CFPB should notify ISPs not to tag email using the name as spam.
  - B) Steps should be taken to guard against imitators and to warn people of potential scammers imitating the CFPB.
  - C) Special outreach to underserved communities.
  - D) Multi-lingual outreach, in at least five languages.
  - E) Require, by regulation, that covered entities provide information about how to file a complaint. If such a regulation must be promulgated by the primary regulator, ask those other primary regulators to do so, copying the CFPB's regulation. The regulation should include providing information by:
    - i) Advertising signs.
    - ii) Customer service representatives of covered entities (require training).
    - ii) Printing "where to complain" information on bills and statements.
    - iv) Posting of "where to complain" information with a link at provider web sites where product information is offered.
  - F) Use specialized organizations to do outreach to invite the filing of complaints.
    - i) Engage in specific outreach to community organizations, military service organizations, legal aid programs and other community-based and social service organizations. Provide advertising signs to organizations for their public areas and for distribution in communities.
  - G) Use both and new and old media in general and targeted outreach. This should include Twitter, Facebook, and other new media as well as newspaper and TV, bus advertisements, billboard advertisements, and specific targeting using old media in communities which are less likely to be reached by new media.
  - H) Additional media outreach should be targeted and timed to run during the news cycle when there are reports of financial scandals or questionable financial business practices.

- I) Track where consumers are posting online complaints about banks, and offer information at those locations about how to complain to the CFPB. This may include links on non-profit sites and paid or unpaid ads on sites where consumers post or comment about their difficulties with financial services, practices or products.
- J) Mobile outreach platform. For example, “text CFPB” for information on how to file a complaint.
- K) Monitor usage of complaint system by type of entity complained about, geographic location of consumer users, and type of product. Increase or modify type and amount of outreach based on implications from the complaint data about who is not using the complaint system.
- L) The CFPB should work with the President’s Counsel on Financial Education and the Financial Literacy Education Commission to add awareness of the CFPB and its complaint center to financial education curricula.

Reasons for proactive outreach: The initial outreach to the public can be broad based and the concept that there is a new CFPB with a complaint center will most likely be more quickly assimilated by the more sophisticated and affluent consumers; those least likely to need such services. Nonetheless outreach needs to be done where the consumers are. This means on the web, at community and legal services offices, in bills and deposit account statements, and through lobby signage, billboards and bus advertisements. It is also very important that the CFPB target outreach to the underserved and those who do not or cannot utilize new media or internet-based forms of communication. Special effort should be invested in outreach to the elderly, the poor, the physically disabled, and in communities where access to or use of technology is limited.

**6) Active performance monitoring to specific performance statistics:**

- A) Annual customer satisfaction analysis focusing on individual consumer satisfaction for those who have filed complaints, using survey, sampling, focus groups, or similar measures.
- B) Annual awareness testing until numbers show that a designated percentage of the U.S. population is aware of the ability to complain to the CFPB. After the desired percentage is achieved, awareness testing can be performed every three years. Target awareness should be no less than 50% of the population.
- C) Annual usability review (semi-annual in the first two years), focusing on busy signals, dropped calls, and similar performance measures.

- D) Average and median time to resolution by type of provider, type of product, and type of issue which is the subject of the complaint.
- E) Total amount of damage claimed and actual amount paid.
- F) Percent of complaints resolved and time to resolution breakdown by ranges.
- G) Percent of complaints where no resolution was reached.
- H) Percent of complaints determined to be unjustified.
- I) By company name - including affiliates and different entities under a bank holding company - for any company with a significant number of complaints by issue, geography, or non-resolved, or by complaint ratio.
- J) All direct supervisory and enforcement actions as well as by nature, type and volume of direct supervisory and enforcement actions.
- K) Nature of complaints not addressed by existing law or regulation.
- L) Perform internal audit, at least annually, including evaluation of performance statistics, meeting timelines, and basis for classification of complaints as unjustified.
- M) Number of rulemakings started, supervisory referrals, and enforcement investigations begun as a result of referrals from complaint information.

Reasons for well-crafted performance statistics: It is essential to the success of the CFPB that its complaint handling and resolution be tracked and analyzed for the purpose of improving the performance of the agency. Public information and stringent controls built into and implemented at the outset of a new government entity are essential to sustain public confidence and to send a message to agency staff about the importance of what to date has been something of a backwater at the bank regulatory agencies. Clear performance statistics and standards will shape the design and the implementation of the system and enhance the public's experience with the CFPB. Advocates for CFPB told the public that the CFPB would be "not more government, but better government." Performance standards and monitoring will be part of how the CFPB delivers on that promise.

**Special case: Consumer complaints from military personnel and their families.**

Handling of consumer complaints concerning their clients has been a special concern and source of frustration for JAG attorneys. The CFPB offers an opportunity to address this through the Office of Service Member Affairs. That office is required to coordinate with the complaint unit to monitor service member complaints and responses to complaints. Our suggestions include the following:

- \* Establish a centralized portal that collects consumer complaints pertaining to the military. Recommend that the complaints be housed at the CFPB and disseminated to the appropriate federal agencies that can address the complaints when they fall outside the CFPB's jurisdiction.
- \* Foster greater coordination with state attorney generals, US Attorneys, and DOJ to bring both civil and criminal cases against entities that financially scam military personnel. Many civil violations have criminal remedies and pursuing the persistent violators through criminal prosecution could induce greater compliance.
- \* Hire investigators for the Office of Service Member Affairs to conduct market testing and go undercover to gather data.

**Special case: Coordination with Fair Lending complaint-handling system**

Some complaints involving mortgage issues will require special attention by the CFPB and coordination with the Department of Housing and Urban Development. For instance:

- \* If aspects of the complaint appear to indicate mortgage discrimination that violates the Fair Housing Act has occurred, the complaint could & should be referred to the Department of Housing and Urban Development. Anybody conducting complaint intake for the CFPB should be trained to assist a complainant fill out a HUD 903 fair housing complaint form, and this information should also be readily available on the CFPB complaint website.
- \* When deciding whether to refer complaints to HUD, there are a number of occasions in which a lender may have violated one of the enumerated consumer laws under the CFPB's jurisdiction while also violating the Fair Housing Act. Consumers should have the ability to have their complaints evaluated for both.

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**Americans for Financial Reform Memo to the Treasury Department  
On a Framework for Consumer Complaint-Handling  
at the Consumer Financial Protection Bureau  
3 Sept 2010**

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**Page 14**

**Conclusion:**

The CFPB's complaint process, and the public perception of that process, must avoid the weaknesses of the OCC complaint system, which were described in detail in Consumer Federation of America testimony by Travis Plunkett before the House Committee on Financial Services, July 2007, pp. 10-15, <http://financialservices.house.gov/hearing110/plunkett.pdf> and illustrated in Good Luck Complaining About Your Bank, *Consumer Reports*, March 2008, <http://www.consumerreports.org/cro/aboutus/mission/viewpoint/bank-complaints-3-08/overview/bank-complaints-ov.htm>. The steps recommended above should make the consumer complaint process more satisfactory to the public.

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